

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
sgizer@earlysullivan.com  
2 Sophia S. Lau, Esq., Nevada Bar No. 13365  
slau@earlysullivan.com  
3 EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP  
4 8716 Spanish Ridge Avenue, Suite 105  
Las Vegas, Nevada 89148  
5 Telephone: (702) 331-7593  
Facsimile: (702) 331-1652

6 Kevin S. Sinclair, State Bar Number 12277  
7 ksinciar@sinclairbraun.com  
SINCLAIR BRAUN LLP  
8 16501 Ventura Blvd, Suite 400  
Encino, California 91436  
9 Telephone: (213) 429-6100  
Facsimile: (213) 429-6101

10 Attorneys for Defendants  
11 CHICAGO TITLE INSURANCE COMPANY and UNITED  
TITLE OF NEVADA, INC.

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
13 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

14 Gary L. Compton, State Bar No. 1652  
2950 E. Flamingo Road, Suite L  
15 Las Vegas, Nevada 89121

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST  
COMPANY,

20 Plaintiff,

21 vs.  
22 FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

23 Defendants.

24 Case No.: 2:20-CV-02268-JCM-VCF

25 **STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT (ECF No. 1)**

26 **(FIRST REQUEST)**

27 COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and  
United Title of Nevada, Inc. (“United Title”) (collectively “Defendants”) and plaintiff Deutsche  
Bank National Trust Company (“Deutsche Bank”), by and through their respective attorneys of  
record, which hereby agree and stipulate as follows:

1       1. On December 15, 2020 Deutsche Bank filed its complaint in the Eighth Judicial  
2 District Court for the State of Nevada;

3       2. On December 15, 2020, Chicago Title removed the instant case to the United  
4 States District Court for the State of Nevada (ECF No. 1);

5       3. On January 8, 2021, Deutsche Bank served its complaint on Chicago Title and  
6 United Title;

7       4. Chicago Title's and United Title's respective responses to Deutsche Bank's  
8 complaint are currently due on Friday, January 29, 2021;

9       5. Counsel for Defendants request a 31-day extension until Monday, March 1, 2021  
10 for Defendants to file their respective responses to Deutsche Bank's complaint to afford  
11 Defendants' counsel additional time to review and respond to Deutsche Bank's complaint.

12       6. Counsel for Deutsche Bank does not oppose the requested extension;

13       7. This is the first request for an extension made by counsel for Defendants, which is  
14 made in good faith and not for the purposes of delay.

15       8. This stipulation is entered into without waiving any of Defendants' objections  
16 under Fed. R. Civ. P. 12.

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1           **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the  
2 complaint is hereby extended through and including March 1, 2021.

3 Dated: January 27, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR  
7 Attorneys for Defendant  
CHICAGO TITLE INSURANCE COMPANY  
8 and UNITED TITLE OF NEVADA, INC.

9 Dated: January 27, 2021

WRIGHT FINLAY & ZAK, LLP

10 By: /s/-Darren T. Brenner

11 DARRENT T. BRENNER  
12 Attorneys for Plaintiff  
DEUTSCHE BANK NATIONAL TRUST  
13 COMPANY

**IT IS SO ORDERED.**

14 Dated this 28th day of January, 2021.  
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16   
17 CAM FERENBACH  
18 UNITED STATES MAGISTRATE JUDGE